

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSE ANDREU,)	
)	
Plaintiff,)	
)	
v.)	Case No. 07 C 00473
)	
UNITED PARCEL SERVICE, INC.,)	Judge Samuel Der-Yeghiayan
)	
Defendant.)	Magistrate Judge Mason

**PLAINTIFF'S UNCONTESTED MOTION FOR LEAVE TO FILE IN EXCESS OF 40
ADDITIONAL FACTS UNDER LOCAL RULE 56.1(b)(3)(C)**

Plaintiff, JOSE ANDREU, by and through his attorneys, THE COFFEY LAW OFFICE, P.C., and pursuant to Rule 56.1(b)(3)(c) of the Local Rules of this court, respectfully moves this Honorable Court for leave to file in excess of 40 additional statements of fact, and in support thereof states as follows:

1. On January 7, 2008, Defendant filed its Motion for Summary Judgment and Rule 56.1 Statement of Uncontested Material Facts in this matter.
2. Defendant's Motion sets forth several fact-intensive grounds that it claims entitle it to judgment as a matter of law on Plaintiff's Illinois state law workers' compensation retaliatory discharge case.
3. There have been 9 depositions taken in this matter and hundreds of pages of documents exchanged by the parties.
4. In drafting the Plaintiff's Local Rule 56.1(b)(3) response to Defendant Statement of Material Uncontested Facts and Local Rule 56.1(b)(3)(C) Statement of Additional

Facts Requiring the Denial of Defendant's Motion, Plaintiff's counsel has found it necessary to exceed 40 separately-numbered paragraphs in order to fully present his case and inform this court of the many factual issues and nuances in this matter.

5. This motion is not brought for any improper purpose. Rather, it is Plaintiff's sincere belief that the additional facts he seeks leave to file will aid this Court's understanding and appreciation of the issues.
6. Counsel for Defendant United Parcel Service, Inc., Attorney D. Scott Watson has advised that he has no objection to this Motion.

Wherefore, Plaintiff, JOSE ANDREU, respectfully requests that this Honorable Court grant him leave to file his Local Rule 56.1(b)(3)(C) Statement of Additional Facts Requiring the Denial of Defendant's Motion with a total of 88 separately-numbered statements of additional facts.

Respectfully submitted,
Plaintiff, JOSE ANDREU,

By: s/ Timothy J. Coffey
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